

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,
Plaintiff,

v.

G. STEVEN PIGEON,
Defendant.

**NOTICE OF MOTION
TO FILE UNDER SEAL
Case No: 17-CR-00190-RJA-MJR**

STATE OF NEW YORK)
COUNTY OF ERIE) ss:
CITY OF BUFFALO)

JUSTIN D. GINTER, ESQ., being duly sworn, deposes and says:

1. I, along with Paul J. Cambria, Jr., represent the defendant G. Steven Pigeon.
2. Your deponent requests that the defendant's Sentencing Memorandum and Letters in Aid of Sentencing be filed under seal because the information set forth therein deals with issues in the case that should not be made available to the public.

WHEREFORE, your deponent prays that this Court rule accordingly.

DATED: Buffalo, New York
July 13, 2022

Respectfully submitted,

/s/Justin D. Ginter, Esq.
JUSTIN D. GINTER, ESQ.

LIPSITZ GREEN SCIME CAMBRIA LLP
PAUL J. CAMBRIA, JR., ESQ.
JUSTIN D. GINTER, ESQ.
Attorneys for Defendant, G. STEVEN PIGEON
42 Delaware Avenue, Suite 120
Buffalo, New York 14202
(716) 849-1333

Subscribed and sworn to before me this
13th day of July, 2022.

/s/Kristina Drewery
Commissioner of Deeds,
Qualified in Erie County
My Commission Expires December 31, 2022

TO: PAUL E. BONANNO, ESQ.
ASSISTANT UNITED STATES ATTORNEY
Federal Centre
138 Delaware Avenue
Buffalo, New York 14202